

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

WAYSIDE CHURCH, et al.,

No. 1:14-CV-1274

Plaintiffs,

Hon. Paul L. Maloney

v.

COUNTY OF VAN BUREN, et al.,

Defendants.

**CLASS REPRESENTATIVES' EMERGENCY MOTION FOR PROTECTIVE ORDER
GOVERNING NON-PARTY SOLICITATIONS OF NAMED PLAINTIFFS AND CLASS
MEMBERS**

Plaintiffs move the Court, pursuant to Federal Rule of Civil Procedure 23 and the Court's inherent authority to regulate attorney misconduct, for an order:

- (a) Enjoining Visser and Associates, PLLC ("Visser") from soliciting or otherwise communicating with Class Members, including through both written and oral communications;
- (b) Requiring Visser to produce an accounting within ten days of all individuals Visser has solicited and the form of such solicitations;
- (c) Authorizing Class Counsel to conduct discovery with responses due in 14 days related to the accounting and Visser's solicitation of Class Members;
- (d) Permitting Class Counsel to send a corrective notice to all Class Members solicited by Visser, in a form approved by the Court, which discloses this Court's finding that Visser has been improperly soliciting Class Members;
- (e) Allowing Class Members to rescind retainer agreements between them and Visser if they were solicited by Visser;

(f) Scheduling a show-cause hearing within 56 days to determine whether Visser should be disqualified from representing Class Members; and

(g) Any other relief this Court deems just and proper.

In support of this motion, Plaintiffs rely upon the accompanying Brief, which is incorporated by reference herein.

Dated: March 29, 2023

Respectfully submitted,

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